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January 28, 2025

Via CM/ECF

Hon. Vera M. Scanlon, U.S.D.J.  
United States District Court  
Eastern District of New York

**Re: Singh v. Topline, et al.  
25 Civ. 776 (NCM)(VMS)**

Dear Judge Scanlon:

This letter is in response to your Honor's order of January 15<sup>th</sup> that has ordered that defendants respond to plaintiff's interrogatories and document demands by January 30, 2026.

I request that defendants be given two more weeks to respond, i.e., until February 13, 2026.

Defendants have not made any such application previously. As your Honor is aware, we have not responded to discovery demands previously as they were first propounded thirty-eight days after ordered to be sent. Nonetheless, I recognize those objections are moot, given my failure to appear at the Conference on January 15<sup>th</sup>.

Due to the Court's rule that requests for extensions be made two days before I deadline, I could not confer with plaintiff's counsel.

Thank you.

Very truly yours,

*Lila Ayers*

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cc: Emanuel Kataev, Esq.